

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
22-cv-1793 (MJD/TNL)**

Norhan Ashraf Askar,

Plaintiff,

v.

**STIPULATION TO AMEND
PROTECTIVE ORDER**

The United States of America, et al.,

Defendants.

The parties hereby stipulate to amendment of the Protective Order [ECF No. 19] as described below. Pursuant to paragraph 7 and paragraph 25 of the Protective Order, the parties stipulate to amend the rights of access to materials designated “Confidential,” “Subject to Protective Order,” or “For Attorneys’ Eyes Only.” Specifically, the parties seek to amend paragraph 11 to include the following persons: 11(i) Trustee for the family of Winston Smith appointed pursuant to Minn. Stat. § 573.02; 11(j) Attorneys for the Trustee for the family of Winston Smith appointed pursuant to Minn. Stat. § 573.02; 11(k) Attorneys retained to represent the individual defendants in any matter relating to the subject of this litigation. Nothing in this stipulation constitutes an admission by any party regarding the confidentiality of, or ability to disclose, any information or document. Nothing in this stipulation limits the rights of any party to dispute the confidential status of information in accordance with the Court’s Protective Order, e.g., ¶ 19 [ECF No. 19]. A proposed amended order is submitted with this stipulation.

Good cause exists for the stipulated amendment to the Protective Order. *Guzhagin v. State Farm Mut. Auto. Ins. Co.*, No. CIV. 07-4650 JRT/FLN, 2009 WL 294305, at *2 (D. Minn. Feb. 5, 2009). The parties agree that certain discovery material should be shared with this limited subset of additional people who have, or represent individuals who have, personal interests in that discovery material.

Respectfully submitted,

Dated: October 20, 2023

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Dated: October 20, 2023October 20, 2023

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